REMARKS

In this paper, we amended various claims and canceled some others. By these amendments, we did not add any new matter. Indeed, the amended claims enjoy abundant support in the application as originally filed, with some examples including pages 13-14 and Figures 1-4A. The claims are now patentably distinguished over the applied art. We respectfully request favorable reconsideration and allowance of all claims in the application.

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The office action rejected the all pending claims as being obvious in view of the combination of Teo and Bachman. Teo relates to a computer network with a configurable router and various networked objects, where the network is configured to allow addition, deletion, and movement of networked objects within the network. [Teo: col. 1, lines 50-66] Teo is aimed at solving the problem of having to manually reconfigure a network when Internet-enabled devices move from one network or node to another. [Teo: col. 1, lines 15-45]

Bachman concerns a method of hierarchical searching in an LDAP directory service having a relational database management system as a backing store. Bachman purports to use parent and descendant tables to filter lists of entries returned from a search to ensure that only entries within a given search scope are retained for evaluation. [Bachman: Abstract]

For a number of reasons, the claims as amended are patentably distinguished over the applied art. Taking claim 43 as an example, Teo-Bachman do not show claimed operations responsive to receiving a query message via the second network from a requesting network device coupled to one of the first networks including "**parsing the query message...**" and "**referencing the directory table to retrieve any access rights...**" and "**consulting the cross-map to identify any equivalent source addresses...**" and **"referencing the directory table to identify any listed network devices that (1) satisfy the retrieved access rights, and (2) satisfy the stated**

criteria, and (3) have an associated network address matching the source address or any equivalent source address of the requesting network device."

Applicant previously discussed in detail why Teo does not teach features such as a directory table, or parsing a query message as claimed. Consequently, Teo lacks the remaining operations that arise from the parsing of this query, such as referencing the directory table to retrieve any access rights, consulting the cross-map to identify equivalent source addresses, and the like.

These are all missing from Teo. However, to set the record straight, some addition discussion is now focused at the claimed cross-map. The office action suggested that Teo discloses the claimed cross-map. [Office Action: page 15] As mentioned above, Teo's routing table is used by Teo's routers to route information, rather than to identify network devices. And, as to Teo's DHCP, ARP, and DNS requests, Teo does not indicate how or why these would be adapted to satisfy client requests for network devices satisfying stated criteria.

Teo purportedly uses a router capable of processing various requests such as DNS, DHCP, and ARP. Teo's routing table is said to route messages to and from the configurable router. This routing table is said to include, for each link layer identifier, a corresponding network layer identifier, a corresponding point-to-point link identifier and a corresponding network interface, wherein the network interface indicates the location associated with the router through which communications are made to the networked object associated with each link layer identifier. [Teo: col. 2, line 50 – col. 5, line 31]

Teo further mentions a transparent router that operates by use of a routing table. This routing table is said to be dynamically updated. Each routing entry has associated with it the link layer identifier (LLI) of the network node for which the entry was inserted. The link layer identifier in this case may or may not include virtual local area network (VLAN) identifier in addition to the network node's LLI. Alternatively, the necessary information may be separated into a routing table and a switching table, as is commonly done in

existing layer three switches. [Teo: col. 7, lines 1-15] Further, Teo's Figure 8 is said to show a routing table. The table of Figure 8 includes items such as link layer identifier (LLI), point to point link identifier (PPLI), network layer identifier (NLI), and network interface (dev).

As exemplified by the foregoing passages, Teo's disclosure fails to contemplate equivalent source addresses as claimed. Thus, Teo does not show the claimed cross-map, or operations such as consulting the cross-map to identify any equivalent source addresses listed for the source address of the requesting network device.

Teo also fails to show retrieving and subsequently using access rights as claimed. In Teo, anonymous file shares are purportedly provided, and access control is determined simply by the LLI of the client node, although additional access control mechanisms (*e.g.*, a simple username/password pair) is possible in future. [Teo: col. 14, lines 62-67] Nevertheless, there is nothing in Teo about storing access rights in a directory table, or considering access rights in serving a network query.

In similar fashion as Teo, Bachman fails to teach the claimed features. Bachman broadly mentions, in response to a search query having a given filter criteria and search scope, returning a list of entries that satisfy the given filter criteria and using a relational table to filter out entries in the list according to the given search scope. [Bachman: Abstract, claim 1] However, further study reveals that Bachman's search scope fails to teach the limitations of claim 43. With Bachman, the relation tables model the relationship between the LDAP entries to facilitate one level and subtree searches without recursive queries. In both cases, the search begins by going into the database and using the LDAP filter criteria to retrieve a list of entries matching the filter criteria. If the search is a one level search, the parent table is then used to filter out EIDs that are outside the search scope based on the starting point or base DN. Likewise, if the search is a subtree search, the descendant table is then used to filter out EIDs that are outside the search scope (again, based on the base DN). Generally, the tables are not required to be used in a base level search. [Bachman: col. 6, lines 13-25] Further details of

Bachman's search appear in Figures 9-10.

As exemplified by the foregoing passages, Bachman's disclosure fails to contemplate claimed features such as "referencing the directory table to retrieve any access rights listed in the directory table in association with the requesting network device" or "consulting the cross-map to identify any equivalent source addresses listed for the source address of the requesting network device."

As discussed above, the references do not show individual features such as the claimed routing table and access rights. Importantly, the applied art does not teach using these features combinedly in processing a received query. More particularly, Teo-Bachman do not show "referencing the directory table to identify any listed network devices that (1) satisfy the retrieved access rights, and (2) satisfy the stated criteria, and (3) have an associated network address matching the source address or any equivalent source address of the requesting network device."

For these reasons, claim 43 is patentably distinguished. Claim 52 is distinguished on similar grounds. And even without considering the individual merits of claims 46-51, they are distinguished by virtue of their dependence from claim 43.

FEES

If any fees are required by this submission, an appropriate fee submittal sheet is enclosed. If fees are required yet this sheet is inadvertently missing, or the fees are incorrect in amount, please charge the charge the required fees or credit any overpayment to Deposit Account No. 07-1445.

Respectfully Submitted,

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